

**JODY A. BARKER and  
KAREN I. BARKER,**

**Plaintiffs,**

**V.**

**AMGUARD INSURANCE  
COMPANY,**

**Defendant.**

**Case No.: 4:21-cv-00225- SRB**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE AND  
DAUBERT MOTIONS**

COME NOW, Plaintiffs Jody and Karen Barker and Defendant AmGuard Insurance Company, (collectively “Parties”) by and through their undersigned counsel, and for their Joint Motion for Extension of Time to File Dispositive and Daubert Motions, hereby states as follows:

1. This matter is presently set for trial beginning on September 19, 2022.
2. Pursuant to this Court's November 3, 2021 text entry, Dispositive Motions and Daubert Motions shall be filed on or before May 2, 2022.
3. The Parties have set the final depositions in this case of Defendant's experts and corporate representative for May 27, 2022.
4. In order to allow for both Parties to adequately prepare any dispositive or Daubert Motions, the Parties request an additional 30 days to file the same up to and including June 3, 2022.
5. This modification is requested for the purpose of accommodating the schedules of the attorneys and the witnesses being deposed and is not meant to cause unnecessary burden or delay.

6. This extension of time should not negatively impact any other existing deadlines or the trial date and should not cause prejudice to any party.

7. Undersigned counsel certifies the parties have conferred regarding this Motion pursuant to Local Rule 37.1 and Plaintiff consents to the extension.

WHEREFORE the Parties respectfully request this Court grant this Motion and enter an order extending the deadline to file Daubert and Dispositive Motions until June 3, 2022 and granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

**KNIGHT NICASTRO MACKAY LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of April 2022, the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Derek H. MacKay